

EXHIBIT 2

PSB’S MOTION FOR SUMMARY JUDGMENT
AND MEMORANDUM IN SUPPORT

Claim: N900010096368

Info		Details	
Author	Amy Coryer-Miller	Mar 26, 2019 1:22 PM	Coverage counsel states that our signature is not needed or appropriate on mediation settlement agreement I received an e-mail from coverage counsel stating that neither our signature nor Phelps Dunbar's signature are appropriate or needed for the mediation settlement agreement. He communicated the same to the group.
Topic	Legal/Litigation		
Related To	Claim		
Author	Amy Coryer-Miller	Mar 26, 2019 9:39 AM	Received Estate's signature on mediator's settlement agreement I received an e-mail from defense counsel with the Estate's counsel's signature on the mediator's settlement agreement. I forwarded it to coverage counsel.
Topic	Legal/Litigation		
Related To	Claim		
Author	Amy Coryer-Miller	Mar 25, 2019 3:09 PM	Accepted mediator's proposal of \$3.8 million It was decided that we would accept the mediator's proposal of \$3.8 million. I attempted to call the mediator, Jon Austen, on his cell of 843-870-0123 and he did not answer. His cell indicated no voice mail is set up. I called defense counsel and left him a voice mail message. He returned my call right away. I informed him of our decision. He will notify the mediator, the Estate's attorney and the policyholder. I notified
Topic	Negotiation		
Related To	Claim		

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Info			Details
			Marsi Kearns of Ringler as the Estate's attorney had indicated to her at mediation that he will likely need to structure a portion of the settlement for the decedent's special needs son in order to get court approval of any settlement. I notified coverage counsel that the mediator's proposal was accepted.
Author	Kimberly Levensky	Mar 25, 2019 2:45 PM	
Topic	Supervisor		Authorized acceptance of Mediator's Proposal
Related To	Claim		Advised examiner ok to accept Mediator's Proposal.
Author	Amy Coryer-Miller	Mar 25, 2019 1:55 PM	
Topic	Legal/Litigation		Secured extension through 2:00 p.m. Arizona time (5:00 p.m. EST) to respond to \$3.8 million mediator's proposal
Related To	Claim		Extension secured through 2:00 p.m. Arizona time (5:00 p.m. EST) to respond to the mediator's proposal.
Author	Amy Coryer-Miller	Mar 25, 2019 9:25 AM	
Topic	Legal/Litigation		Mediator states intent for the \$3.8 million mediator's proposal was that Nautilus pay \$3.8 million
Related To	Claim		I received an e-mail from defense counsel stating that he spoke to Lloyds' counsel and the mediator. They both confirmed that the mediator's intent

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Info			Details
			loss. He maintains that she was at his house to pick up a check that his father left for the decedent for work she did for his father.
Author	Amy Coryer-Miller	Mar 20, 2019 5:42 PM	
Topic	Sensitive		Forwarded defense counsel's mediation statement to coverage counsel
Related To	Claim		I tried calling coverage counsel, but the office is already closed. I forwarded defense counsel's mediation statement to coverage counsel. In this statement, defense counsel states that the decedent was working at the hunting cabin on the date of loss. I was going to address this at the mediation, but decided to alert coverage counsel now. We were told that Ms. Satterfield had come to the Murdaugh home to pick up a check from Murdaugh's father for work that she had done for his father. I asked how we should address the possibility that the decedent was working for Murdaugh on the date of loss.
Author	Amy Coryer-Miller	Mar 19, 2019 7:40 AM	
Topic	Sensitive		Received defense counsel's mediation statement
Related To	Claim		I received a copy of an e-mail that defense counsel sent to the mediator with his confidential mediation statement.
Author	Amy Coryer-Miller	Mar 18, 2019 4:54 PM	
Topic	Sensitive		Roundtable for discussion of settlement authority

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Info		Details
Related To	Claim	I participated in a roundtable to discuss settlement authority for the upcoming mediation. I have \$2 million in authority, but will not offer in excess of \$1 million unless there is an indication that we can resolve the claim at \$2 million or less. The IBNR reserve will be addressed.
Author	Amy Coryer-Miller	Mar 18, 2019 2:48 PM
Topic	Sensitive	Surveillance on 3/16/18
Related To	Claim	I received a report from the investigator. Surveillance on Saturday, 3/16/18, was conducted and video was obtained of multiple male subjects. At about 8:00 a.m., one male exited the residence with a golf bag and golf shoes and left the residence with another male. At 10:00 a.m., Michael Satterfield emptied trash and returned to the residence. He then left the residence and returned 3 hours later. The investigator wanted to know if I knew Brian's date of birth. I replied stating I don't. I asked him to send me still photographs of the men observed.
Author	Amy Coryer-Miller	Mar 18, 2019 11:38 AM
Topic	Sensitive	Received and reviewed coverage counsel's updated coverage analysis and draft Mediation Position Paper
Related To	Claim	I received an updated coverage analysis from coverage counsel with a draft coverage Mediation Position Paper. The position paper addressed REDAC

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Info		Details
		the reports and the invoice to the Lloyd's adjuster and requested reimbursement for 50% of the invoice, which is \$379.52.
Author	Mark Nestor	Apr 5, 2018 3:21 PM
Topic	Message	Unusual circumstances may need SIU involvement
Related To	Claim	To Amy Coryer Miller: Hi, Mark.
		Could you take a look at the claim notes and see if you have any ideas about how we can investigate this for purposes of SIU?
		The Lloyd's adjuster and I believe this claim is very questionable. The law firm representing the Estate is the policyholder's former law firm. It is very rare that a partner of a law firm would represent a client adverse to a former partner. He also said that he pulled an obituary for Ms. Satterfield that indicated the policyholder is a relative of Ms. Satterfield. This is contrary to what the policyholder told him. If the policyholder is a potential heir to the Estate, that would raise concerns. We also have to question the policyholder's claim that Ms. Satterfield regained consciousness for a moment just long enough to tell the policyholder that one of his dogs jumped on her and knocked her over. This appears to be extremely convenient. He also states that the policyholder is adamant about accepting liability and is seeking an acknowledgement that the case

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Author	Amy Coryer-Miller	Mar 22, 2018 4:01 PM	
Topic	Sensitive		SIU Referral
Related To	Claim		I referred the claim to SIU hoping Mark might have some ideas about how we can investigate the questionable aspects of this claim.
Author	Amy Coryer-Miller	Mar 22, 2018 3:52 PM	
Topic	Sensitive		Questionable
Related To	Claim		The Lloyd's adjuster believes this claim is very questionable and "fishy." He said the law firm representing the Estate is the policyholder's former law firm. He said it is very rare that a partner of a law firm would represent a client adverse to a former partner. He also said that he pulled an obituary for Ms. Satterfield that indicated the policyholder is a relative of Ms. Satterfield. This is contrary to what the policyholder told him. The Lloyd's adjuster also questions whether Ms. Satterfield regained consciousness for a moment just long enough to tell the policyholder that one his dogs jumped on her and knocked her over. He also states that the policyholder is adamant about accepting liability and is seeking an acknowledgement that the case is worth policy limit
Author	Amy Coryer-Miller	Mar 22, 2018 3:51 PM	
Topic	Investigation		